



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

DOES NOT CONTAIN NATIONAL  
SECURITY INFORMATION (E.O. 12065)

10/10/2018

OCT 15 2018

Re: Incomplete TSCA low volume exemption L-18-0340

Dear Submitter,

This letter serves to notify you that your company's low volume exemption referenced above contained chemical identity/nomenclature errors, and therefore, under the Environmental Protection Agency's (EPA) policy regarding notices declared incomplete due to chemical identity/nomenclature errors, is declared incomplete. The LVE was dated and received by the Agency on 09/30/2018. The reasons for which your notice was judged incomplete can be found in the attached checklist. According to 40 CFR 720.45 (60 FR 16310) effective May 30, 1995, submitters must provide a Chemical Abstracts (CA) Index Name or CA Preferred Name that follows the Ninth Collective Index (9CI) of CA nomenclature rules and conventions. As provided in 40 CFR 720.65(c)(1), the 30-day review period will not commence until the EPA has received a complete LVE

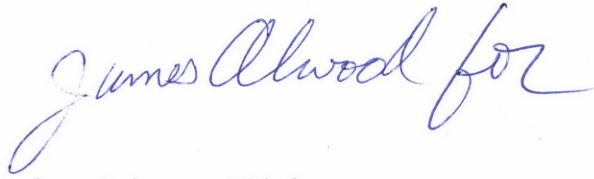
The EPA requests that your company resubmit your low volume exemption including the information identified as necessary to complete your submission. If you decide to complete the LVE, then you must resubmit the **entire** LVE including the information necessary to complete your submission and an original signature; a partial submission will not be accepted. If you resubmit, the notice should include the same original unique identification user fee number (40 CFR 700.45(e)(3) ("TS number").

Pursuant to 40 CFR 720.65 (c)(4), within ten days of receiving this letter, you may file written objections requesting that the EPA accept the submission as a complete notice or modify the requirements necessary to complete the submission. The EPA will respond within ten days of receiving such objections.

To ensure your LVE's completeness before resubmitting it to the EPA, please carefully review your submission and the LVE rule amendments published in the Federal Register of March 29, 1995 (60 FR 16298).

Thank you for your cooperation. If you have any questions or comments, please contact me at 202-564-8469.

Sincerely,

A handwritten signature in blue ink that reads "James Alwood for". The signature is written in a cursive, flowing style.

Greg Schweer, Chief  
New Chemicals Management Branch

Attachments

### Section 5 Submitter Error Checklist (rev 1/27/98 version 61)

Your chemical identity information as submitted according to \_\_\_ Method 1 or \_\_\_ Method 2 is not acceptable because:

\_\_\_ (A) The correct Chemical Abstracts name has not been provided.

X (B) The correct CAS Registry Number, if one already exists for the substance, has not been provided.

CASRN provided is not valid.

\_\_\_ (C) The correct molecular formula has not been provided, where applicable.

\_\_\_ (D) A complete, correct chemical structure diagram for Class 1 substance has not been provided.

\_\_\_ (E) A correct partial or representative chemical structure diagram has not been provided for a Class 2 substance or polymer, where such information is known or reasonably ascertainable.

X (F) There is an inconsistency among two or more parts of the chemical identification, which involves

___	(1) the reported chemical name,
___	(2) CAS Registry Number,
___	(3) molecular formula,
___	(4) chemical structure diagram,
<u>X</u>	(5) identity of immediate chemical precursor or monomer,
<u>X</u>	(6) manufacturing process information, or
___	(7) other:

Information provided on PMN page 5 for precursors does not match information provided on manufacturing diagrams.

\_\_\_ (G) Because the reported substance is polymeric, page 5 of the PMN form (concerning information on polymers) must be completely filled out.

\_\_\_ (H) Correct chemical names and CAS Registry Numbers (where numbers are available) have not been provided for all monomers and other reactants used to manufacture a reported polymer.

\_\_\_ (I) Correct chemical names and CAS Registry Numbers (where numbers are available) have not been provided for all immediate precursors used to manufacture a Class 2 substance.

\_\_\_\_\_ (J) For a Class 2 substance, information about the nature of the manufacturing reaction/process or the typical (or range of) product composition (where appropriate) has not been provided.

\_\_\_\_\_ (K) A letter of support has not been received from the supplier of the reported substance or a chemical precursor in order to provide the required specific chemical identity information not included in the notice.

\_\_\_\_\_ (L) Supporting information from a prior notice (PMN, Bona Fide Intent Notice, etc.) you reference is not consistent with your reported chemical identity information.

\_\_\_\_\_ (M) The reported generic chemical name does not provide a sufficient level of chemical identity information See TSCA Section 14(c)(1)(C)(i); 40 CFR 720.85(a)(3)(B). For instructions on generic names see: <https://www.epa.gov/tsca-inventory/instructions-developing-generic-names-premanufacture-notices-pmn-tsca-inventory>.

\_\_\_\_\_ (N) The manufacturing process information does not include specific chemical names and/or weights for all starting materials.

  X   (O) Method 1 was used, but the information provided to the CAS Inventory Expert Service is not identical to that included in the PMN.

Information provided to IES is different from information on the notice. This could cause a change of the chemical name assigned.

\_\_\_\_\_ (P) Not all of the chemical names reported for substances in a consolidated PMN have been obtained from the CAS Inventory Expert Service.

\_\_\_\_\_ (Q) Other:

Date: 10/10/2018

Section 5 Number (if assigned yet by EPA):	L-18-0340
Use Fee ID Number (If assigned by submitter):	TS-06TS8C



Instructions on how to "copy" a thin client submission when it is called Incomplete:

1. Open the ePMN thin client software.
2. Download the Copy of Record (COR); Extract the files from the COR and store them locally.
3. Make a copy of the XML file and rename it "formdata.xml".
4. Add the formdata.xml to a zipped folder.
5. In the ePMN thin client, create a new PMN form; enter passphrase.
6. Select the Import button on the bottom left.
7. Select your zipped folder to import.
8. Go through each screen and check for completeness; re-upload any attachment associated with that section.
9. Re-upload any remaining attachments in the additional attachment screen.
10. Make edits; don't forget to include the original PMN number under the previously submitted section.